

EXCERPTS FROM THE DEPOSITION OF
DEEPAK AHUJA
TAKEN AUGUST 5, 2021

Confidential

Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC.,)
) Case No.
SECURITIES LITIGATION,) 3:18-cv-04865-EMC
_____)

** CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER **

REMOTE VIDEO DEPOSITION OF
DEEPAK AHUJA
Thursday, August 5, 2021

Reported by:
LISA MOSKOWITZ, CA CSR 10816, RPR, CRR, CLR,
Washington State CSR 21001437
NCRA Realtime Systems Administrator
JOB NO. 197876

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

August 5, 2021

8:33 a.m.

Remote Video deposition of DEEPAK

AHUJA, taken on behalf of Plaintiffs, reported
stenographically by Lisa Moskowitz, California
Certified Shorthand Reporter No. 10816,
Washington State Certified Shorthand Reporter
No. 21001437, RPR, CRR, Realtime Systems
Administrator.

1 A P P E A R A N C E S:

2
3 For the Plaintiffs:

4 LEVI & KORSKINSKY

5 1101 30th Street, N.W.

6 Washington, DC 20007

7 BY: NICHOLAS PORRITT, ESQ.

8 BY: ELIZABETH TRIPODI, ESQ.

9
10 For Tesla and the Deponent:

11 COOLEY

12 3175 Hanover Street

13 Palo Alto, California 94304

14 BY: SARAH LIGHTDALE, ESQ.

15 BY: BINGXIN WU, ESQ.

16
17 ALSO PRESENT:

18 PHIL RIZZUTI, Videographer

19 CANDACE JACKMAN, ESQ., TESLA

20 KATHY AMES

1 THURSDAY, AUGUST 5, 2021

2 8:33 A.M.

3
4 THE VIDEOGRAPHER: Good morning,
5 Counsel. My name is Phil Rizzuti. I am
6 a legal videographer in association with
7 TSG Reporting, Inc. Due to the severity
8 of the COVID-19 and following the
9 practice of social distancing, I will
10 not be in the same room with the
11 witness. Instead, I will record this
12 videotape deposition remotely.

13 The reporter, Lisa Moskowitz, also
14 will not be in the same room and will
15 swear the witness remotely.

16 Do all parties stipulate to the
17 validity of this video recording and
18 remote swearing and that it will be
19 admissible in the courtroom as if it had
20 been taken following Rule 30 of the
21 Federal Rules of Civil Procedure and the
22 state's rules where this case is
23 pending?

24 MR. PORRITT: Yes.

25 MS. LIGHTDALE: Yes.

1 THE VIDEOGRAPHER: Okay. Thank
2 you.

3 This is the start of media labeled
4 number 1 of the video-recorded
5 deposition of Mr. Deepak Ahuja in the
6 matter of In Re Tesla, Inc., Securities
7 Litigation in the United States District
8 Court for the Northern District of
9 California, San Francisco Division,
10 Civil Action Number 3:18-cv-04865.

11 This deposition is being held on
12 August 5, 2021, at approximately
13 8:35 a.m. My name is Phil Rizzuti. I'm
14 the legal video specialist from TSG
15 Reporting, Inc. The court reporter is
16 Lisa Moskowitz, in association with TSG
17 Reporting.

18 Counsel, please introduce
19 yourselves.

20 MR. PORRITT: Good morning, I'm
21 Nicholas Porritt of Levi & Korsinsky on
22 behalf of the plaintiff and the class.

23 MS. LIGHTDALE: Good morning.
24 Sarah Lightdale of Cooley on behalf of
25 the defendants and for the witness

1 today. With me are my colleague Bing
2 Wu, as well as Candace Jackman, in-house
3 counsel at Tesla.

4 MR. PORRITT: I should add for the
5 record, with me are my colleagues
6 Elizabeth Tripodi and Kathy Ames.

7 THE VIDEOGRAPHER: Thank you.

8 Will the court reporter please
9 swear in the witness.

10
11 DEEPAK AHUJA,
12 called as a witness, having been duly sworn, was
13 examined and testified as follows:

14
15 EXAMINATION

16 BY MR. PORRITT:

17 Q. Good morning, Mr. Ahuja. As you
18 heard, my name is Nicholas Porritt. I'm one
19 of the counsel for the class and the
20 plaintiff in this action, and I'll be taking
21 your deposition here today.

22 Before we start, I just thought I'd
23 go over a few ground rules for your
24 testimony here today. First one is you
25 understand that you're under oath?

DEPOSITION TESTIMONY
FILED UNDER SEAL

ERRATA
FILED UNDER SEAL

C E R T I F I C A T E

STATE OF CALIFORNIA:

I, LISA MOSKOWITZ, California CSR,
Washington State CSR, RPR, CRR, CLR, NCRA
Realtime Systems Administrator, Certified
Shorthand Reporter, do hereby certify:

That the witness whose deposition is
hereinbefore set forth was duly remotely sworn
and that such deposition is a true record of the
testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage and that I am in no way interested in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 17th day of August, 2021.



LISA MOSKOWITZ, CA CSR 10816, RPR, CRR
Washington State CSR 21001437
Realtime Systems Administrator